

**STATEMENT OF BASIS (AI No. 17208)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0094242 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Frank's Casing Crews and Rental Tools, Inc.  
Lafayette Shop  
Post Office Box 51729  
Lafayette, Louisiana 70505

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Michelle Bickham

**DATE PREPARED:** April 15, 2009

**1. PERMIT STATUS****A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

**B. LPDES permit – LA0094242**

LPDES permit effective date: March 1, 2004

LPDES permit expiration date: February 28, 2009

**C. Date Application Received: October 6, 2008****2. FACILITY INFORMATION****A. FACILITY TYPE/ACTIVITY - oilfield service company**

Frank's Casing Crews and Rental Tools, Inc., Lafayette Shop is an existing oilfield service company that installs, inspects, welds, drives and distributes oilfield tubulars. Rental tools and equipment that have come in contact with crude oil are also cleaned here. Additional services include providing engineering solutions and fabrication and threading of tubular.

**B. FEE RATE**

1. Fee Rating Facility Type: minor

2. Complexity Type: II

3. Wastewater Type: II

4. SIC code: 1389

**C. LOCATION - 700 Verot School Road, Lafayette, Lafayette Parish**  
Latitude 30° 10' 51", Longitude 91° 59' 31"

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3. **OUTFALL INFORMATION**

Outfall 001

Discharge Type: equipment washwater and treated sanitary wastewater  
Treatment: oil/water separator, charcoal filtration, sewage treatment plant (aeration, clarification, chlorination)  
Location: at the point of discharge from the treatment system located on the northeast side of the facility  
Flow: 1400 gpd  
Discharge Route: local drainage thence to the Vermilion River

Outfall 002

Discharge Type: treated sanitary wastewater  
Treatment: sewage treatment plant (aeration, clarification, chlorination)  
Location: at the point of discharge from the sewage treatment plant located on the northwest side of the facility  
Flow: 500 gpd  
Discharge Route: local drainage thence to the Vermilion River

Outfall 003

Discharge Type: equipment washwater and treated sanitary wastewater  
Treatment: oil/water separator, sewage treatment plant (aeration, clarification, chlorination)  
Location: at the point of discharge from the treatment system located on the east side of the facility  
Flow: 1400 gpd  
Discharge Route: local drainage thence to the Vermilion River

Outfall 004

This outfall has been removed from the permit. Equipment washwater from this outfall is trucked over to Outfall 001 where it is discharged as per a phone conversation and email received on April 14, 2009.

Outfall 005

Discharge Type: treated sanitary wastewater  
Treatment: sewage treatment plant (aeration, clarification, chlorination)  
Location: at the point of discharge from the sewage treatment plant located on the southwest side of the facility  
Flow: 2500 gpd  
Discharge Route: local drainage thence to the Vermilion River

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#### Outfall 006

Discharge Type: treated sanitary wastewater  
Treatment: sewage treatment plant (aeration, clarification, chlorination)  
Location: at the point of discharge from the sewage treatment plant located on the southeast side of the facility  
Flow: 2500 gpd  
Discharge Route: local drainage thence to the Vermilion River

#### 4. RECEIVING WATERS

STREAM - local drainage thence to the Vermilion River

BASIN AND SEGMENT - Vermilion-Teche Basin, Segment 060801

DESIGNATED USES - a. primary contact recreation  
b. secondary contact recreation  
c. propagation of fish and wildlife  
f. agriculture

#### 5. TMDL STATUS

Subsegment 060801, Vermilion River - From Headwaters to LA 3073 Bridge, is not listed on LDEQ's Final 2006 303(d) list as impaired. However, Subsegment 060801 was previously listed as impaired for phosphorus, nitrogen, organic enrichment/low DO, pathogen indicators, suspended solids/turbidity/siltation, and carbofuran for which the below TMDL's have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

Total Maximum Daily Loads (TMDLs) completed:

##### Carbofuran

The TMDL for Carbofuran in the Mermentau and Vermilion Teche River Basins was final on March 21, 2002. No allocation was given to point source discharges in the Vermilion Teche River Basin. According to the TMDL, there is only one point source in the Vermilion Teche (FMC Corp. LA0064360), but it no longer discharges Carbofuran. In addition, this facility has no potential to discharge Carbofuran. Therefore, requirements for Carbofuran will not be placed in this permit.

##### Nitrogen/Phosphorus

The TMDL for Dissolved Oxygen and Nutrients in the Vermilion River was final on April 5, 2001. No allocation was given to point source discharges in the Vermilion Teche River Basin. LDEQ's position on nutrients, as supported by the ruling in *Sierra Club v. Givens*, 710 So.2d 249 (La. App. 1st Cir. 1997), writ denied, 705 So.2d 1106 (La. 1998), is that when oxygen-demanding substances are controlled and limited in order to ensure that the dissolved oxygen criterion is supported, nutrients are also controlled

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and limited. LAC 33:IX.2707.D.1.f.iii allows the establishment of effluent limitations based on an indicator parameter for the pollutant of concern. LDEQ's consistent approach to controlling nutrients where the WQMP does not otherwise require specific nutrient limitations is achieved by limiting the discharge of oxygen-demanding substances through BOD<sub>5</sub> and COD limitations. Compliance with the BOD<sub>5</sub> and COD limitations as the indicator parameters will result in the control of nutrients from the discharge sufficient to attain and maintain the applicable water quality standard. Effluent monitoring of the indicator parameter as conducted by the permittee in accordance with the permit in addition to LDEQ's ambient water quality monitoring program will allow for further evaluation by the Department to determine the effectiveness of the limitation. The reopener clause located in the permit allows the Department to modify or revoke and reissue the permit if the limitations as set on the indicator parameter are shown to no longer attain and maintain applicable water quality standards.

Suspended solids/turbidity/siltation

As per the TMDL for TSS, Turbidity, and Siltation for the 15 Subsegments in the Vermilion River Basin, point source loads are so small as to be insignificant, and because effective policies are in place to limit TSS discharges, no specific reductions from point sources are required. Standard TSS limitations are included in this permit.

Organic Enrichment/Low DO

Per the EPA's Vermilion River Dissolved Oxygen and Nitrogen TMDL, the limits apply to sanitary discharges, and process outfalls of food processors and seafood processors. For discharges less than 25,000 GPD, secondary limits shall apply as per the TMDL. The organic enrichment/low DO impairment shall be addressed through the BOD<sub>5</sub> and COD parameters established in this permit.

Pathogen Indicators

Per The Vermilion River Fecal Coliform TMDL, there will be no change in the permit requirements based upon a wasteload allocation resulting from this TMDL. The pathogen indicators impairment shall be addressed through the standard fecal coliform limitations established in this permit.

**6. PROPOSED EFFLUENT LIMITS**

BASIS - See Rationale below.

Changes from previous permit:

- The limits for Outfall 001, 002, 003, 005, and 006 have been updated in accordance with the reissuance of the Class I Sanitary Discharge General Permit and the fecal coliform weekly average limits has been changed to daily max limits on Outfalls 002, 003, 005, and 006.
- Oil and Grease, visual has been added to Outfall 001.
- Equipment washwater and the parameters for equipment washwater have been added to Outfall 003.
- Outfall 004 has been removed from the permit.

**7. COMPLIANCE HISTORY/COMMENTS**

DMR's were reviewed for the last two years (1/07 – 12/08). All DMR's were submitted in accordance with the existing permit with the exception of Outfall 004. There were no DMR's submitted for July 2008 – December 2008 for Outfall 004 as there is no longer a discharge from this outfall. (This effluent is now being discharged through Outfall 001.) Below is a summary of excursions for the remaining outfalls.

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Date	Parameter	Outfall	Reported Value	Permit Limits
12/07	BOD	003	228 mg/L	45 mg/L
6/07	TSS	004	115 mg/L	45 mg/L
5/07	TSS	001	80 mg/L	45 mg/L
5/07	Oil & Grease	001	18 mg/L	15 mg/L
4/07	TSS	001	125 mg/L	45 mg/L

## 8. EXISTING EFFLUENT LIMITS

Outfall 001 – treated sanitary wastewater and equipment washwater

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow	Report 1/month Est.	Report 1/month Est.
TSS	---	45 mg/L 1/month Grab
COD	200 mg/L 1/month Grab	300 mg/L 1/month Grab
Oil & Grease	---	15 mg/L 1/month Grab
pH	6.0-9.0 s.u. 1/month Grab	
Soaps & Detergents	Report 1/month Grab	
BOD	---	45 mg/L 1/6 months Grab
Fecal Coliform	---	400 col/100 mL 1/6 months Grab

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Outfalls 002, 003, 005, and 006 – treated sanitary wastewater

Parameter	LPDES	
	Monthly Average	Weekly Average
Flow	Report 1/6 months Est.	Report 1/6 months Est.
BOD <sub>5</sub>	---	45 mg/L 1/6 months Grab
TSS	---	45 mg/L 1/6 months Grab
Fecal Coliform	---	400 col./100mL 1/6 months Grab
pH	6.0-9.0 s.u. 1/6 months Grab	

Outfall 004 – equipment washwater

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow	Report 1/quarter Est.	Report 1/quarter Est.
TSS	---	45 mg/L 1/quarter Grab
COD	200 mg/L 1/quarter Grab	300 mg/L 1/quarter Grab
Oil & Grease	---	15 mg/L 1/quarter Grab
pH	6.0-9.0 s.u. 1/quarter Grab	
Soaps & Detergents	Report 1/quarter Grab	

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## **9. ENDANGERED SPECIES**

The receiving waterbody, Subsegment 060801 of the Vermilion-Teche Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008, from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

## **10. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

## **11. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

## **12. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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### Rationale for Frank's Casing Crews and Rental Tools, Inc.

1. **Outfall 001** - equipment washwater and treated sanitary wastewater (estimated flow is 1400 gpd)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
TSS	---	45	Similar discharges* (BPJ), LAG530000, LAG480000
COD	200	300	Similar discharges* (BPJ), LAG480000
Oil & Grease	---	15	Similar discharges* (BPJ), LAG480000
Soaps & Detergents	Inventory Record	---	Similar discharges* (BPJ), LAG480000
Oil & Grease, Visual	---	No Presence	Similar discharges* (BPJ), LAG480000
BOD <sub>5</sub>	30	45	Similar discharges* (BPJ), LAG530000
Fecal Coliform	200	400	Similar discharges* (BPJ), LAG530000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG530000, LAG480000

**Treatment:** oil/water separator, charcoal filtration, sewage treatment plant (aeration, clarification, chlorination)

**Monitoring Frequency:** Daily for oil & grease, visual; semiannually for BOD<sub>5</sub> and fecal coliform; monthly for all other parameters at the point of discharge from the treatment system located on the northeast side of the facility. The monitoring frequency will remain at monthly for the washwater parameters because the facility continues to have exceedances for this outfall.

**Limits Justification:** Limits are based on current guidance for similar discharges from other industrial facilities and the Class I Sanitary Discharge General Permit, LAG530000 effective November 1, 2007, and the Light Commercial General Permit, LAG480000 effective August 1, 2001.

2. **Outfalls 002, 005, and 006** - treated sanitary wastewater (estimated flow is Outfall 002 – 500 gpd, Outfall 005 – 2500 gpd, and Outfall 006 – 2500 gpd)

Pollutant	Limitation		Reference
	Monthly Avg	Weekly Avg	
	mg/L		
Flow	---	Report	
BOD <sub>5</sub>	30	45	Similar discharges* (BPJ), LAG530000
TSS	30	45	Similar discharges* (BPJ), LAG530000
Fecal Coliform colonies/100ml	200	400 (Daily Max)	Similar discharges* (BPJ), LAG530000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG530000

**Treatment:** sewage treatment plants (aeration, clarification, chlorination)

**Monitoring Frequency:** Semiannually for all parameters at the point of discharge from the various sewage treatment plants.



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**Limits Justification:** Limits are based on current guidance for similar discharges from other industrial facilities and the Class I Sanitary Discharge General Permit, LAG530000 effective November 1, 2007.

3. **Outfall 003 - equipment washwater and treated sanitary wastewater (estimated flow is 1400 gpd)**

Pollutant	Limitation		Reference
	Monthly Avg. mg/L	Daily Max. Report	
Flow	Report	Report	
TSS	---	45	Similar discharges* (BPJ), LAG530000, LAG480000
COD	200	300	Similar discharges* (BPJ), LAG480000
Oil & Grease	---	15	Similar discharges* (BPJ), LAG480000
Soaps & Detergents	Inventory Record	---	Similar discharges* (BPJ), LAG480000
Oil & Grease, Visual	---	No Presence	Similar discharges* (BPJ), LAG480000
BOD <sub>5</sub>	30	45	Similar discharges* (BPJ), LAG530000
Fecal Coliform	200	400	Similar discharges* (BPJ), LAG530000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG530000, LAG480000

**Treatment:** oil/water separator, charcoal filtration, sewage treatment plant (aeration, clarification, chlorination)

**Monitoring Frequency:** Daily for oil & grease, visual; semiannually for BOD<sub>5</sub> and fecal coliform; quarterly for all other parameters at the point of discharge from the treatment system located on the east side of the facility

**Limits Justification:** Limits are based on current guidance for similar discharges from other industrial facilities and the Class I Sanitary Discharge General Permit, LAG530000 effective November 1, 2007, and the Light Commercial General Permit, LAG480000 effective August 1, 2001.

Note: EPA Guidelines for Metal Products & Machinery (40 CFR Part 438) are applicable; however, more stringent state requirements for exterior equipment washwater are being placed on Outfalls 001 and 003.

\* Existing permits for similar outfalls  
 BPJ Best Professional Judgement  
 su Standard Units

**NOTE**

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

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### **STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT**

An SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 1389 are considered to have storm water discharges associated with industrial activity.

**For first time permit issuance**, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).